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5 Attorney for Lawrence Williams, *also known as* Mikaeel Youf Azeem

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7  
8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF WASHINGTON  
10 Hon. Thomas O. Rice

11 United States of America,

12 No. 2:20-cr-171-TOR

13 Plaintiff,

14 Notice of Intent to Enter Guilty  
15 Plea

16 v.

17 Lawrence Williams, *also known as*  
18 Mikaeel Youf Azeem,

19 Defendant.

1 Mikaeel Azeem has been charged with (1) wire fraud in violation of 18 U.S.C. §  
2 1343, and (2) aggravated identity theft in violation of 18 U.S.C. § 1028A.<sup>1</sup> He is  
3 scheduled to appear before the Court for a pretrial conference on May 6, 2021.<sup>2</sup> The  
4 defense understands that the government will dismiss Count 2 (aggravated identity  
5 theft) prior to the pretrial conference. At the pretrial conference, the defense  
6 anticipates Mr. Azeem pleading guilty to Count 1 (wire fraud). Because Mr. Azeem  
7 would be pleading guilty without a plea agreement, the defense submits the following  
8 summary in the hope it may assist the Court.

9 **A. Maximum Statutory Penalties**

10 Mr. Azeem understands the wire fraud charge carries the following maximum  
11 statutory penalties:

12

- 13 • imprisonment of up to 20 years;
- 14 • a fine of up to \$250,000;
- 15 • a term of supervised release of up to three years; and
- 16 • a \$100 special penalty assessment.<sup>3</sup>

17 **B. Sentencing Guidelines**

18 Mr. Azeem understands that the Court will determine his Offense Level and  
19 Criminal History Category under the Federal Sentencing Guidelines, which will result

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<sup>1</sup> ECF No. 1 (Indictment).

<sup>2</sup> ECF No. 20 (Order Granting Motion to Continue).

<sup>3</sup> 18 U.S.C. §§ 1343, 3013(a)(2)(A), 3571(b)(3), 3583(b)(2); *see also* ECF No. 3 (Penalty Slip).

1 in an advisory sentencing range. Mr. Azeem understands that the Court must consider  
2 this range as one of the sentencing factors set forth at 18 U.S.C. § 3553(a).

3 **C. Elements of the Offense**

4 To convict Mr. Azeem of wire fraud, the United States would have to prove the  
5 following elements beyond a reasonable doubt:

6

- 7 • Mr. Azeem knowingly devised a scheme or plan to defraud, or a scheme or  
plan to obtain money or property by means of false or fraudulent pretenses,  
representations, or promises;
- 8 • The statements made as part of the scheme were material;
- 9 • Mr. Azeem acted with the intent to defraud; and
- 10 • Mr. Azeem used an interstate wire communication to carry out an essential  
part of the scheme.

11 **D. Factual Basis**

12 The defense anticipates Mr. Azeem agreeing to the following facts:

13 While residing in Spokane, Washington, Mr. Azeem lived in a residence owned  
14 by Phoenix Counseling Services. He was not authorized to request payments on behalf  
15 of Phoenix Counseling Services. Mr. Azeem was acquainted with J.G., whose Social  
16 Security payments were handled on her behalf by the Humboldt County, California,  
17 Public Guardian Office. Between August 31, 2020, and September 3, 2020, Mr. Azeem  
18 contacted J.G.'s Humboldt County payee and represented that he was an employee of  
19 Phoenix Counseling Services and was providing services to J.G. On September 1, 2020,  
Mr. Azeem, while in the Eastern District of Washington, sent the Humboldt County

1 payee an email purporting to be an itemized invoice requesting \$2,450 in payment for  
2 services Phoenix Counseling Services had allegedly provided to J.G. After receiving  
3 this email, the Humboldt County payee mailed Mr. Azeem a check for \$2,450. Mr.  
4 Azeem received this check and cashed it in Spokane, Washington.

5 **E. Waiver of Rights**

6 Mr. Azeem understands by pleading guilty, he is knowingly and voluntarily  
7 waiving certain constitutional rights, including:

8

- the right to a jury trial;
- the right to see, hear, and question the witnesses;
- the right to remain silent at trial;
- the right to testify at trial; and
- the right to compel witnesses to testify.

12 While Mr. Azeem is waiving certain constitutional rights, he understands he  
13 retains the right to be assisted through the sentencing and any direct appeal by an  
14 attorney, who will be appointed at no cost if Mr. Azeem cannot afford to hire an  
15 attorney.

16 Dated: April 15, 2021

17 Federal Defenders of Eastern Washington & Idaho  
18 Attorneys for Lawrence Williams, *also known as*  
19 Mikael Youf Azeem

s/ Houston Goddard  
Houston Goddard, NY #4545851

1 **SERVICE CERTIFICATE**

2 I certify that on April 15, 2021, I electronically filed the foregoing with the  
3 Clerk of the Court using the CM/ECF System, which will notify Assistant United  
4 States Attorneys Michael Ellis and Timothy Ohms.

5 s/ Houston Goddard  
6 Houston Goddard, NY #4545851  
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